

EX PARTE OR LATE FILED

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February 17, 1994

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C., 20554


Re: EX PARTE PRESENTATION
CC Docket No. 92-77

Dear Mr. Caton:

Today, R. Reid Presson, Vice President of Intellicall, Inc. ("Intellicall"), Judith St. Ledger-Roty and I met with Chairman Reed E. Hundt, Ms. Karen Brinkman and Mr. Thomas Egler to discuss issues in the above-captioned docket. The positions Mr. Presson, Ms. St. Ledger-Roty and I expressed during the meeting are reflected on the attached outline and in Intellicall's CC Docket No. 92-77 filings.

In accordance with the Commission's rules, 47 C.F.R. § 1.1206(a)-(b), I am filing an original and two copies of this notice of ex parte presentation. Please direct any questions about this filing to me.

Sincerely,


Michael R. Wack

Enclosure

cc: Chairman Reed E. Hundt
Ms. Karen Brinkman
Mr. Thomas Egler

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EX PARTE PRESENTATION

BILLED PARTY PREFERENCE

(CC DOCKET NO. 92-77)

**R. REID PRESSON, VICE PRESIDENT
INTELLICALL, INC.**

FEBRUARY 17, 1994

BPP IS A SOLUTION IN SEARCH OF A PROBLEM

- TOCSIA FRAMEWORK ALREADY ENSURES CONSUMERS ACCESS TO THEIR CARRIER-OF-CHOICE.
- ALL PAY TELEPHONES NOW UNBLOCKED AND SUBJECT TO CARRIER BRANDING.
- FCC REPORT TO CONGRESS ON O+ MARKET FOUND THAT TOCSIA PROTECTIONS ARE WORKING AND ACCESS CODE DIALING HAS GAINED WIDE ACCEPTANCE.
- TARGETED TOCSIA ENFORCEMENT PROCEEDINGS ARE MOST EFFICIENT & EFFECTIVE MEANS OF ADDRESSING MINIMAL REMAINING "BAD ACTOR" ISSUES WITHIN O+ INDUSTRY.

**COMMITTING RESOURCES TO BPP WILL CURTAIL
FCC & INDUSTRY ABILITY TO DEVELOP NATIONAL
INFORMATION INFRASTRUCTURE POLICIES**

- **LACK OF INDUSTRY CONSENSUS ON BPP TECHNICAL STANDARDS MEANS AGENCY MUST BECOME INVOLVED WITH NETWORK & CPE OPERATING ISSUES TO AN UNPRECEDENTED DEGREE.**
- **MANY COMPLEX & LENGTHY PROCEEDINGS WILL BE REQUIRED, INCLUDING:**

TECHNICAL STANDARDS RULEMAKING

ACCESS CHARGE REVISIONS (PART 69)

COMPENSATION RULEMAKING

TARIFF PROCEEDINGS

PRESUBSCRIPTION RULEMAKINGS

BPP IS ANTI-CONSUMER

- BPP IS A FIGHT ABOUT O+ MARKET SHARE, NOT CONSUMER PROTECTION. NO CONSUMER GROUP HAS FILED COMMENTS URGING THE ADOPTION OF BPP.
- BPP WILL HARM CONSUMERS BY DRIVING UP THE COST OF EVERY O+ CALL.
- BPP WILL FRUSTRATE CONSUMERS BY INJECTING CONFUSION & DELAY INTO O+ CALLING.

BPP IS ANTI-COMPETITIVE

- BPP REVERSES 30 YEARS OF FCC "OPEN NETWORK" POLICIES.
- BPP CLOSES O+ MARKET TO ALL BUT THE HANDFUL OF COMPANIES THAT MARKET CALLING CARDS NATIONWIDE.
- COMPETITIVE PAY TELEPHONE PROVIDERS, SMALL IXC's, CAPS AND CREDIT CARD COMPANIES WILL BE LOCKED OUT OF O+ MARKET.

BPP IS PROHIBITIVELY EXPENSIVE

- 1ST YEAR INSTALLATION COSTS WILL EXCEED \$1.5 BILLION.
- ANNUAL ADMINISTRATIVE COSTS WILL EXCEED \$250 MILLION.
- BPP COSTS ARE TOO HIGH TO BE RECOVERED SOLELY FROM BPP USERS. SPREADING COSTS ACROSS ALL NETWORK USERS UNFAIRLY BURDENS CONSUMERS AND COMPANIES WHO NEITHER WANT NOR NEED BPP.

BPP STIFLES TECHNOLOGICAL INNOVATION

- BPP PREVENTS FURTHER DEVELOPMENT OF INNOVATIVE O+ EQUIPMENT AND SERVICES BY IXCs, CAPs, PREMISES OWNERS & PAY TELEPHONE PROVIDERS.
- BPP LOCKS PUBLIC SWITCHED NETWORK INTO OUTMODED TECHNOLOGIES.

Technology Timeline

